

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

ATHENA LUNDBERG, BROOKE MARRIN
a/k/a BROOKE BANX, CORA SKINNER,
DENISE MILANI a/k/a DENISE TRLICA,
HILLARY FISHER VINSON a/k/a HILLARY
HEPNER, IRINA VORONINA, KIMBERLY
COZZENS, JAIME EDMONDSON-
LONGORIA, JENNIFER ARCHULETA,
JESSICA BURCIAGA, JESSICA
ROCKWELL, MALU LUND, a/k/a MASHA
LUND, LUCY PINDER, PAOLA CANAS,
SARA UNDERWOOD and TIFFANY TOTH
GRAY,

Plaintiffs,

- against -

ONE THREE FIVE, INC. and ALBERT
BORTZ,

Defendants.

Case No. 19-cv-692-CRE

[PROPOSED] DEFAULT JUDGMENT

The defendant ONE THREE FIVE, INC. (“Defendant”) having failed to plead or otherwise defend this action, and default having therefore been entered; upon application of plaintiffs ATHENA LUNDBERG, BROOKE MARRIN a/k/a BROOKE BANX, CORA SKINNER, DENISE MILANI a/k/a DENISE TRLICA, HILLARY FISHER VINSON a/k/a HILLARY HEPNER, IRINA VORONINA, KIMBERLY COZZENS, JAIME EDMONDSON-LONGORIA, JENNIFER ARCHULETA, JESSICA BURCIAGA, JESSICA ROCKWELL, MALU LUND, a/k/a MASHA LUND, LUCY PINDER, PAOLA CANAS, SARA UNDERWOOD and TIFFANY TOTH GRAY (collectively, “Plaintiffs”), and upon declaration that the Defendant is indebted to Plaintiffs in the principal sum of six hundred and ten thousand dollars (\$610,000), plus Plaintiffs’ costs and fees, including expert fees, which total fourteen thousand ninety-seven dollars and eighty cents (\$14,097.80); plus interest thereon; that

Defendant has been defaulted for failure to appear pursuant to Rule 55(a) of the Federal Rules of Civil Procedure; and that the claim is for a sum certain or for a sum which can be computation be made certain; it is hereby:

ORDERED, ADJUDGED and DECREED that Plaintiffs recover from Defendants, jointly and severally, the principal sum of \$610,000, plus Plaintiffs' costs and fees, which total, \$14,097.80 and interest thereon according to law from the date of this judgment until the entire amount is paid; and it is further,

ORDERED, ADJUDGED and DECREED that Defendants are permanently enjoined from using any Images of Plaintiffs in their advertising, including without limitation those Images annexed to the Complaint.

This judgment is entered by the Clerk at the request of Plaintiffs and upon affidavit that said amount is due, in accordance with Rule 55(b)(1) of the Federal Rules of Civil Procedure.

Dated: _____, Pennsylvania
_____, 20____

By: _____
Clerk of Court